

From: [Benbow, Gene](#)
To: [Baris, Reuben](#); [Hebert, John](#)
Subject: FW: Glue Trap with Pheromones
Date: Wednesday, December 04, 2013 3:19:36 PM
Attachments: [image001.png](#)

Thoughts?

I know who to ask about this, but he's out of town I believe.....

Gene Benbow
Biologist, EPA
Insecticides-Rodenticides Branch
Registration Division
<http://epa.gov/pesticides/>
703-347-0235

From: Adams, Menyon
Sent: Wednesday, December 04, 2013 3:18 PM
To: Benbow, Gene; Roelofs, James; Edwards, Dennis; Forrest, Robert A; Friedman, Dana; Hebert, John; Knorr, Michele; Koch, Erin; Laws, Meredith; Louie-Juzwiak, Rosanna; OKeefe, Barry; Panger, Melissa; Sims, Diann; Stangel, David; Walls, Cassi; Wilson, Kim; Zinn, Nicole; Charlton, Tom; Wormell, Lance
Subject: FW: Glue Trap with Pheromones

LCC Members,

Any thoughts?

Best Regards,

Menyon Adams, Biologist
U.S. Environmental Protection Agency
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From: Pfeifer, Jay
Sent: Wednesday, December 04, 2013 12:04 PM
To: Bryceland, Andrew; Kausch, Jeannine; Jones, Russell; Cerrelli, Susanne
Subject: FW: Glue Trap with Pheromones

Hi,

Any thoughts/experience with this issue? I understand that pheromone traps do not require registration. But I'm unsure about whether they require an Est. # (as a device). 152.25 seems to say they are outside of FIFRA regulation, which implies that they may not require an Est# (as most trap devices do). But 152.500 lists non-vertebrate traps as requiring an Est.# (and the LRM refers to glue traps specifically as requiring the Est#.)

My experience has been that the most restrictive interpretation applies – suggesting that they need an Est#. But I'd like to know if we've come down on this issue before.

BTW - I need to get back to her tomorrow AM

Thanks for your thoughts,
Chris

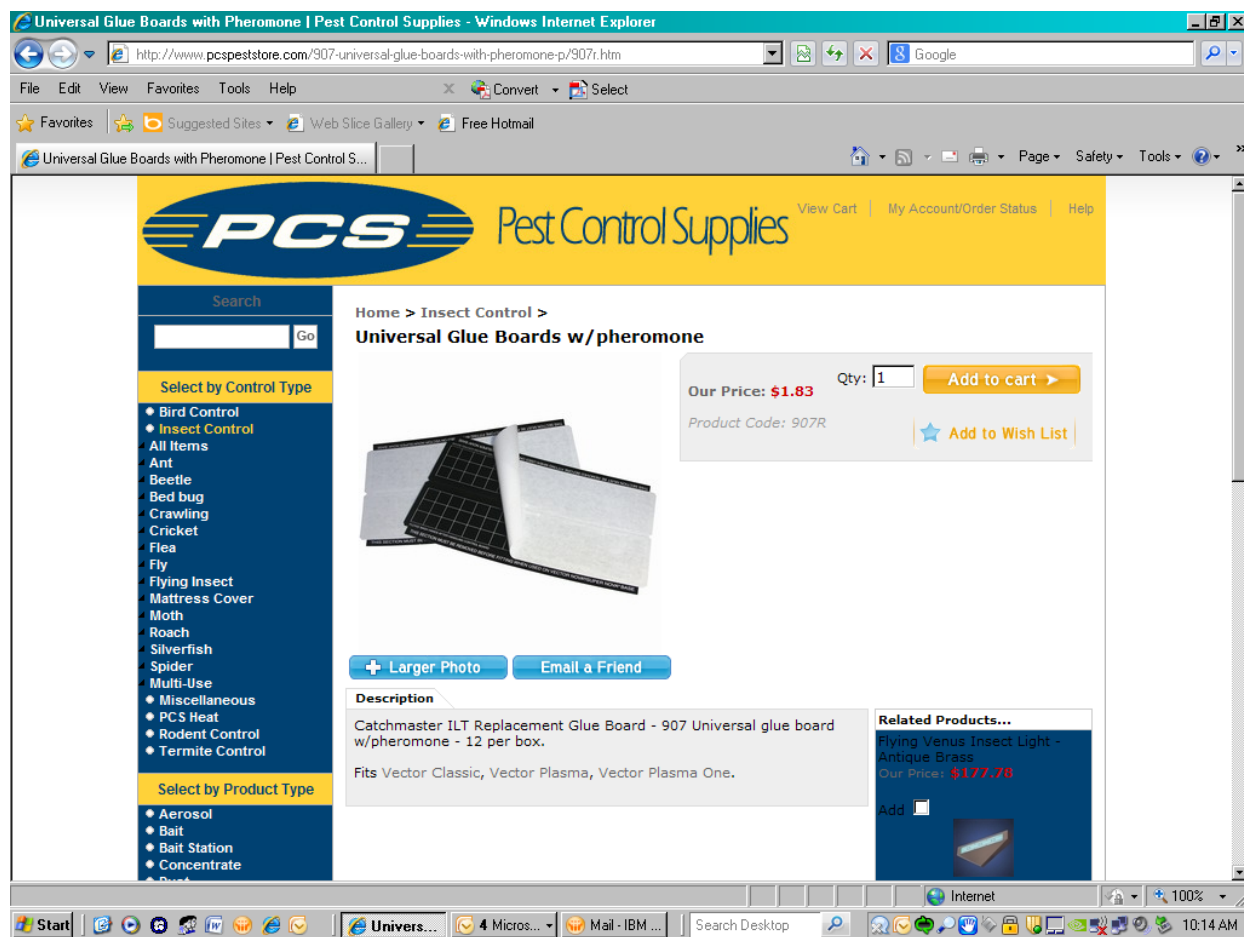
From: Shepard, Barbara
Sent: Wednesday, December 04, 2013 11:21 AM
To: Pfeifer, Jay
Subject: Glue Trap with Pheromones

Hi, Chris!

Thanks for returning my call today. I have received a public inquiry requesting information on glue traps with pheromones. I checked the regs. at 40 CFR Sec. 152.25 regarding pheromones, which states that traps that have pheromones aren't subject to requirements of FIFRA – indicating the EPA Est. No. doesn't need to be written on the device.

If, however, the pheromone is used in conjunction with a 'glue' trap, does the EPA Est. No. need to be written on the device? We are uncertain if the regs. cover this situation, and whether the maker of the device is deliberately trying to circumvent FIFRA.

The name of the product is: Universal Glue Trap with Pheromones. I've included a screen shot of the internet site I used to search for information for this device:



Thanks for any help you can give me on this!
Barb

Barbara Shepard,
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